

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GLENDA JOHNSON et al,)	
)	
Plaintiffs,)	
)	
v.)	
)	
SMITHKLINE BEECHAM CORPORATION)	
et al,)	Case No. 2:11-cv-05782-PD
)	AND ALL RELATED CASES
Defendants.)	
)	

**NOTICE OF CAROLYN SAMPSON IN RESPONSE TO JUNE 9, 2021
NOTICE OF HAGENS BERMAN**

Carolyn Sampson was not involved in the 2017 hearings regarding the contested motions to withdraw and takes no position on any specific exhibit or portion of the transcript that reflects an attorney client privileged communication. Doc. 746 at 33-34.

Subject to the above, the 2017 hearings included what the Special Master refers to as a “modified first step,” Doc. 746 at 27, and Hagens Berman calls an “all-Plaintiffs session.” Doc. 750 at ¶ 9. On April 15, 2020, Hagens Berman served a report from Abraham Reich that included a discussion of the litigation generally. Doc. 743 at 3-5. The Special Master substantially unsealed and filed the Reich report on the public docket on May 18, 2021. *Id.* The Special Master has noted that “most of Mr. Reich’s discussion of the history of the litigation is, like the testimony at the

hearing, quite general.” *Id.* at 28. The “testimony at the hearing” appears to be a reference to the testimony offered during the modified first step of the 2017 hearings.

Despite the apparent similarity between the now public Reich report and the testimony and exhibits offered during the modified first step of 2017 hearings, Hagens Berman seeks to maintain such testimony and exhibits under seal. Doc. 750 at ¶ 50. It would be incongruous for the Reich report’s discussion of the litigation generally to be publicly available, while simultaneously maintaining a seal over the testimony and exhibits that informed the opinion. Subject to redaction for any attorney-client communications, Sampson requests that the testimony and exhibits from the “modified first step” or “all-Plaintiffs session” be unsealed and made available to any interested participant or member of the public.¹

¹ For this reason, at least the 2019 testimony (and exhibits) of Steve Berman and Nicholas Styant-Browne considered by Reich and cited in his report should also be unsealed.

June 11, 2021

HANSEN REYNOLDS, LLC

By: /s/ Nicholas S. Boebel

Nicholas S. Boebel

(Admitted Pro Hac Vice)

Email:

nboebel@hansenreynolds.com

225 S. 6th Street, Suite 3900

Minneapolis, MN 55402

Telephone: 612.286.0208

Facsimile: 414.273.8476

Attorney for CAROLYN SAMPSON
FOR ISSUES RELATING TO THE
SPECIAL DISCOVERY MASTER'S
INVESTIGATION

CERTIFICATE OF SERVICE

I, Nicholas Boebel, certify that on this date I caused to be served the foregoing Notice of Carolyn Sampson in Response to June 9, 2021 Notice of Hagens Berman on all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Date: June 11, 2021

/s/ Nicholas S. Boebel

Nicholas S. Boebel